Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Emergency Broadband Benefit Program)	WC Docket No. 20-445

CELLULAR SOUTH LICENSES, LLC SUPPLEMENT TO PETITION FOR LIMITED WAIVER

In furtherance of discussions with Commission staff, Cellular South Licenses, LLC d/b/a C Spire ("C Spire"), hereby supplements its request for a waiver, filed May 14, 2021 in the above-captioned proceeding. In order to assist the Commission's ability to project Emergency Broadband Benefit ("EBB") Program support exhaust and properly inform the public, C Spire will be pleased to provide the Universal Service Administrative Company ("USAC") with a monthly forecast of the EBB Program support that it anticipates drawing in the following month for newly enrolled subscribers. C Spire will provide its forecast by the fifteenth day of each month, the same day as the deadline for submitting the monthly reimbursement claim. On that date, C Spire will have a count of its newly enrolled customers and the estimated support dollars for those customers. C Spire's forecast for newly enrolled subscribers will be added to the reimbursement amount that will result from the claim for existing subscribers, so USAC is provided the total forecasted reimbursement for all of C Spire's EBB subscribers.

For the first month of the program (June 1 snapshot date and June 15 reimbursement claim deadline), all of C Spire's EBB customers will be new, so the initial forecast will cover 100% of C Spire's EBB customers. In each subsequent month, C Spire will prepare a forecast estimating the total reimbursement for the newly enrolled customers. This will be based on C Spire's best estimate of the average reimbursement amount claimed per customer. Together with

the reimbursement claim for existing subscribers, which will have the actual reimbursement amounts for each customer, C Spire's monthly forecast will enable USAC to project the total reimbursement for all of C Spire's customers in a given month.

C Spire is pleased to make this commitment as a condition of the Commission granting the requested waiver relief. Should the Commission require any additional information, please contact undersigned counsel directly.

Respectfully submitted,

CELLULAR SOUTH LICENSES, LLC d/b/a C SPIRE

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Its attorneys

May 27, 2021

¹ Admitted to the Bar under D.C. App. R. 46-A (Emergency Examination Waiver) and practicing under the supervision of D.C. Bar members.